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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CORNELIA MARTINEZ, an  
individual; ANA VELASQUEZ, an  
individual; HILDA DERAS, an  
individual; CARMEN CASTRO, an  
individual; GLORIA MORALES, an  
individual, and SAJE, a 501(c)(3)  
non-profit organization,

Plaintiffs,

v.

OPTIMUS PROPERTIES, LLC, a  
California limited liability company;  
OPTIMUS PROPERTY  
MANAGEMENT, LLC, a California  
limited liability company;  
ROXBURY VENTURES, LLC, a  
California limited liability company;  
MAGNOLIA AVENUE  
PROPERTIES, LLC, a California  
limited liability company; and  
JEROME MICKELSON, an  
individual,

Defendants.

CASE NO.: 2:17-cv-03581-SVW-MRW

**(1) JOINT STIPULATION RE:  
DISMISSAL WITHOUT  
PREJUDICE; AND**

Filed Concurrently Herewith:

**(2) [PROPOSED] ORDER.**

Judge: Hon. Stephen V. Wilson

Courtroom: 10A

PEDRO RAMOS, an individual; and  
NICOLAS GREGORIO, an  
individual;

Plaintiffs,

v.

OPTIMUS PROPERTIES, LLC, a  
California limited liability company;  
OPTIMUS PROPERTY  
MANAGEMENT, LLC, a California  
limited liability company;  
ROXBURY VENTURES, LLC, a  
California limited liability company;  
SOUTH NORMANDIE  
PROPERTIES, LLC, a California  
limited liability company; and  
JEROME MICKELSON, an  
individual,

Defendants.

CASE NO.: 2:17-cv-03582-SVW-MRW

CARLOS ESCAMILLA, an  
individual; POLONIA  
HERNANDEZ, an individual; and  
SAJE, a 501(c)(3) non-profit  
organization,

Plaintiffs,

v.

OPTIMUS PROPERTIES, LLC, a  
California limited liability company;  
OPTIMUS PROPERTY  
MANAGEMENT, LLC, a California  
limited liability company;  
ROXBURY VENTURES, LLC, a  
California limited liability company;  
SOUTH KENMORE PROPERTIES,  
LLC, a California limited liability  
company; and JEROME  
MICKELSON, an individual,

Defendants.

CASE NO.: 2:17-cv-03583-SVW-MRW

1 DEMETRIUS ALLEN, an  
2 individual; and MICHAEL  
PRUDHOMME, an individual,

3 Plaintiffs,

4 v.

5 OPTIMUS PROPERTIES, LLC, a  
California limited liability company;  
6 OPTIMUS PROPERTY  
MANAGEMENT, LLC, a California  
7 limited liability company;  
ROXBURY VENTURES, LLC, a  
8 California limited liability company;  
NORMANDIE LINDEN, LLC, a  
9 California limited liability company;  
and JEROME MICKELSON, an  
individual,

10 Defendants.  
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CASE NO.: 2:17-cv-03584-SVW-MRW

12  
13 ARTHUR RIVERA, an individual;  
JAMARCUS REYNOLDS, an  
14 individual; and STEP UP ON  
SECOND STREET, INC., a  
15 501(c)(3) non-profit organization,

16 Plaintiffs,

17 v.

18 OPTIMUS PROPERTIES, LLC, a  
California limited liability company;  
19 OPTIMUS PROPERTY  
MANAGEMENT, LLC, a California  
20 limited liability company;  
ROXBURY VENTURES, LLC, a  
21 California limited liability company;  
MARIPOSA/8TH STREET  
22 PROPERTIES, LLC, a California  
limited liability company; and  
JEROME MICKELSON, an  
individual,

23 Defendants.  
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CASE NO.: 2:17-cv-03585-SVW-MRW

PEDRO GUERRERO, an individual;  
and SAJE, a 501(c)(3) non-profit  
organization,

Plaintiffs,

v.

OPTIMUS PROPERTIES, LLC, a  
California limited liability company;  
OPTIMUS PROPERTY  
MANAGEMENT, LLC, a California  
limited liability company;  
ROXBURY VENTURES, LLC, a  
California limited liability company;  
MKM WESTWOOD, LLC, a  
California limited liability company;  
and JEROME MICKELSON, an  
individual,

Defendants.

CASE NO.: 2:17-cv-03586-SVW-MRW

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20 *Attorneys for Defendants*  
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1 WHEREAS, on November 17, 2016, Plaintiffs filed their Original Complaint  
2 against Defendants in the United States District Court of the Central District of  
3 California, Western Division: *Martinez, et al. v. Optimus Properties, LLC, et al.*,  
4 Case No. 2:16-cv-08598 (ECF No. 1) (the “Original Action”);

5 WHEREAS, on March 13, 2017, the Honorable Judge Stephen V. Wilson  
6 ordered Plaintiffs to file, on or before May 12, 2017, separate Complaints for each of  
7 the five buildings in which the Plaintiffs in the Original Complaint resided (ECF No.  
8 47);

9 WHEREAS, on May 11, 2017, Plaintiffs filed six related actions against  
10 Defendants in the United States District Court of the Central District of California,  
11 Western Division: five actions pursuant to Judge Wilson’s Order in the Original  
12 Action (ECF No. 47), *Martinez, et al. v. Optimus Properties, LLC, et al.*, Case No.  
13 2:17-cv-03581 (1423 S. Magnolia); *Ramos, et al. v. Optimus Properties, LLC, et al.*,  
14 Case No. 2:17-cv-03582 (756 S. Normandie); *Escamilla, et al. v. Optimus*  
15 *Properties, LLC, et al.*, Case No. 2:17-cv-03583 (250 S. Kenmore); *Allen, et al. v.*  
16 *Optimus Properties, LLC, et al.*, Case No. 2:17-cv-03584 (837 S. Normandie); and  
17 *Rivera, et al. v. Optimus Properties, LLC, et al.*, Case No. 2:17-cv-03585 (238 S.  
18 Mariposa); as well as a sixth action, *Guerrero, et al. v. Optimus Properties, LLC, et*  
19 *al.*, Case No. 2:17-cv-03586 (401 S. Kenmore) (collectively the “Related Actions”);

20 WHEREAS, on June 26, 2017, Defendants filed Answers to each of the six  
21 Complaints in the Related Actions;

22 WHEREAS, the Parties have reached a settlement to resolve all outstanding  
23 claims between the Parties in the Related Actions;

24 WHEREAS, as of September 6, 2018, a settlement agreement was fully  
25 executed by all Parties;

26 WHEREAS, the Parties agreed to file a joint stipulation and [proposed] order  
27 to dismiss three defendants **without prejudice**—Optimus Properties, LLC, Optimus  
28 Property Management, LLC, and Jerome Mickelson—from the Related Actions

1 within five court days of the date upon which the settlement agreement was fully  
 2 executed by all Parties;

3 WHEREAS, the Parties agreed to file a joint stipulation and [proposed] order  
 4 to dismiss the Related Actions in their entirety with prejudice within five court days  
 5 of the date upon which the Plaintiffs receive the Settlement Payment from  
 6 Defendants and their insurers;

7 WHEREAS, the Defendants and their insurers have not yet paid the  
 8 Settlement Payment and therefore the Parties **do not** seek to dismiss the remaining  
 9 Defendants nor the Related Actions in their entirety at this time.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by  
 11 and between the Parties, through their undersigned counsel, that, pursuant to Federal  
 12 Rule of Civil Procedure 41(a), the Parties request that the Court enter the [Proposed]  
 13 Order submitted herewith dismissing Defendants Optimus Properties, LLC; Optimus  
 14 Property Management, LLC; and Jerome Mickelson from the Related Actions  
 15 **without prejudice.**

16 Dated: September 13, 2018

SKADDEN, ARPS, SLATE, MEAGHER &  
 FLOM LLP

18 /s/ Emily Ludmir Aviad

19 Matthew E. Sloan  
 20 Emily Ludmir Aviad  
 21 Richard A. Schwartz  
 Alyssa J. Clover  
 Rachael T. Schiffman

22 *I, Emily Ludmir Aviad, attest that all other*  
 23 *signatories listed, and on whose behalf the filing*  
 24 *is submitted, concur in the filing's content and*  
*have authorized the filing.*

25 Dated: September 13, 2018

PUBLIC COUNSEL

26 /s/ Deepika Sharma

27 Anne K. Richardson  
 28 Deepika Sharma  
 Justin Raymond

1 Dated: September 13, 2018

BRANCART & BRANCART

2 /s/ Christopher Brancart

3 Christopher Brancart  
4 Liza Cristol-Deman

5 Dated: September 13, 2018

HOUSING RIGHTS CENTER

6 /s/ D. Scott Chang

7 D. Scott Chang  
8 Azadeh Hosseinian

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9 Dated: September 13, 2018

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10 /s/ Thomas H. Citron

11 Thomas H. Citron  
12 Katherine A. Tatikian

Dated: September 13, 2018

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13 /s/ Barry J. Reagan

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